



**SMUD**

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ P. O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211  
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

MPC&D 01-012

February 20, 2001

U.S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Washington, DC 20555

Docket No. 50-312  
Rancho Seco Nuclear Generating Station  
License No. DPR-54

**PROPOSED LICENSE AMENDMENT NO. 195 AND EXEMPTION FROM 10  
CFR 50.54(P) AND 10 CFR PART 73**

Attention: Paul Harris

In accordance with 10 CFR 50.12 "Specific Exemptions," we are requesting a permanent exemption from the security requirements of 10 CFR 50.54(p) and 10 CFR Part 73 as it applies to the 10 CFR Part 50 licensed facility. In addition, in accordance with 10 CFR 50.90, we are submitting Proposed Amendment No. 195 (PA-195) to the Rancho Seco License and Permanently Defueled Technical Specifications (PDTS).

The requested exemption and proposed license amendment would eliminate the security plan requirements from the 10 CFR 50 licensed site after we have transferred the Rancho Seco spent nuclear fuel from the spent fuel pool to the Independent Spent Fuel Storage Installation (ISFSI). Specific changes would include deleting Section 2.C(3) "Physical Protection" from Rancho Seco Facility Operating License No. DPR-54 and deleting all references in the PDTS to the Rancho Seco Nuclear Generating Station security plans.

After completing the fuel movement to the ISFSI, the only special nuclear material remaining within the 10 CFR 50 licensed site would be three small Pu-Be check sources and ~21 grams of enriched uranium in self-powered neutron detectors. SMUD will provide protection for the spent fuel at the Rancho Seco ISFSI in accordance with the security plan approved by the NRC as meeting the requirements of 10 CFR 72, Subpart H.

With the transfer of the spent nuclear fuel to the ISFSI, the remaining 10 CFR 50 facility would be comparable to a source and byproduct licensee in terms of the level of security required to protect public health and safety. The continued application of the 10 CFR Part 73 requirements to the Rancho Seco Nuclear Generating Station would no longer be

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necessary to meet the underlying purpose of the rule. Moreover, the continued application of the 10 CFR 73 requirements would cause SMUD to expend significantly more funds for security requirements than other source and byproduct material licensees.

We further request that the NRC make the proposed amendment effective immediately upon the transfer of the last canister of spent fuel from the spent fuel building to the ISFSI. Our current schedule projects that we will need NRC completion of this licensing action by the end of the year 2001. We will keep you apprised of any significant changes to our schedule.

Attachment 1 provides the insertion removal instructions for the affected pages. Attachment 2 provides the description and analysis of the proposed change and the No Significant Hazards Consideration. Attachment 3 provides a copy of the revised affected pages and Attachment 4 provides a redline/strikeout copy of the affected pages to facilitate NRC review.

In accordance with 10 CFR 50.91(b)(1), we have informed the Radiological Health Branch of the California State Department of Health Services of the proposed amendment by sending them a copy of this submittal package.

Members of your staff with questions requiring additional information or clarification may contact Robert Jones at (916) 732-4843.

Sincerely,

A handwritten signature in cursive script that reads "James J. Field for Steve Redeker". The signature is written in black ink and is positioned above the printed name.

Steve Redeker  
Manager, Plant Closure and Decommissioning

Attachments (4)

Cc w/ attachments: E.W. Merschoff, NRC, Region IV  
Director, Radiological Health Branch, California State Department  
of Health Services

ALL PURPOSE ACKNOWLEDGMENT

State of California  
County of Sacramento } ss.

On February 20, 2001 before me, ~~James~~ Susan R. Terry, Notary Public  
personally appeared James J. Field

personally known to me - OR -  ~~proved to me on the basis of satisfactory evidence~~ to be the person(s) whose name(s) is/~~are~~ subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(~~ies~~), and that by his/~~her/their~~ signature(~~s~~) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Susan R. Terry

(Notary Seal)

CAPACITY CLAIMED BY SIGNER  
(Supplemental Information)

INDIVIDUAL(S) SIGNING FOR ONESELF/THEMSELVES

CORPORATE OFFICER(S)

\_\_\_\_\_  
TITLE(S)

\_\_\_\_\_  
COMPANY

PARTNERS

\_\_\_\_\_  
PARTNERSHIP

ATTORNEY-IN-FACT

\_\_\_\_\_  
PRINCIPAL(S)

TRUSTEES

\_\_\_\_\_  
TRUST

OTHER

\_\_\_\_\_

\_\_\_\_\_

# **Attachment 1**

## ***Proposed License Amendment No. 195***

### ***Rancho Seco Operating License and Permanently Defueled Technical Specification Change***

#### REMOVAL/INSERTION INSTRUCTIONS

##### REMOVE

##### INSERT

##### Operating License

Page 3

Page 3

Page 4

Page 4

##### Technical Specifications

Page D1-3

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## **Attachment 2**

***Exemption Request, Description of the Proposed Change, and No  
Significant Hazards Consideration***

## **Exemption Request**

### **Background**

The Sacramento Municipal Utility District (SMUD) is the holder of Facility Operating License DPR-54, which applies to Rancho Seco Nuclear Generating Station. SMUD shut down Rancho Seco permanently in June 1989, and all of the spent nuclear fuel has been stored in the spent fuel pool since December 1989. On March 17, 1992, the NRC issued a Possession Only License for Rancho Seco.

NRC regulations 10 CFR 50.54(p) and 10 CFR 73.55 provide security requirements to protect spent nuclear fuel while within the boundary of a licensed power reactor site. The current NRC-approved Long Term Defueled Condition Physical Security Plan (LTDC PSP) describes the security policies, procedures, responsibilities, and standards that pertain to individuals entering the Industrial and Protected Areas of the Rancho Seco site. Implementation of the LTDC PSP provides high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to public health and safety.

On June 30, 2000, the NRC issued Rancho Seco ISFSI Materials License No. SNM-2510. Concurrent with issuing this license, the NRC approved the Rancho Seco Physical Protection Plan (PPP), which complies with the security requirements in 10 CFR Part 72, Subpart H. In approving the Rancho Seco ISFSI PPP, the NRC found that the plan meets the requirements in 10 CFR 73.51 and provides reasonable assurance that the storage of spent nuclear fuel at the ISFSI will not constitute an unreasonable risk to public health and safety with respect to physical protection. The PPP will become effective upon the complete transfer of spent nuclear fuel from the spent fuel pool to the ISFSI.

After completing the fuel movement to the ISFSI, the only special nuclear material remaining within the 10 CFR 50 licensed site would be three small Pu-Be check sources and ~21 grams of enriched uranium in self-powered neutron detectors. Hence, the remaining 10 CFR 50 licensed site will be comparable to a source and byproduct licensee in terms of the level of security required to protect public health and safety.

### **Regulatory Evaluation**

In accordance with 10 CFR 50.12 "Specific Exemptions" SMUD requests a specific exemption from the current requirements in 10 CFR Part 73 and 10 CFR 50.54(p). These regulations provide the basis for the commitments in the security, contingency, and guard qualification and training plans for Rancho Seco Nuclear Generating Station.

10 CFR 73.55(a) "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage" states:

“The licensee shall establish and maintain an onsite physical protection system and security organization which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not create an unreasonable risk to the public health and safety.”

10 CFR 50.54(p) states:

“The licensee shall prepare and maintain safeguards contingency plan and procedures in accordance with appendix c of part 73 of this chapter for effecting the actions and decisions contained in the Responsibility Matrix of the Safeguards contingency plan.”

10 CFR 73.5 “Specific Exemptions” states:

“The Commission may, upon application of any interested person or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest.

Upon completing the transfer of the spent fuel from the spent fuel pool to the ISFSI, the only special nuclear material remaining within the 10 CFR 50 licensed site would be three small Pu-Be check sources and ~21 grams of enriched uranium in self-powered neutron detectors. At that time, the potential for radiological sabotage at the 10 CFR 50 licensed site would be eliminated.

The security requirements of 10 CFR 73, as applicable to a 10 CFR 50 licensed site, presume that the purpose of the facility is to possess and use special nuclear material. Therefore, the continued application of the 10 CFR 73 requirements to Rancho Seco Nuclear Generating Station would no longer be necessary to achieve the underlying purpose of the rule.

With the transfer of the spent nuclear fuel to the ISFSI, the level of security needed to protect the public health and safety at the 10 CFR 50 licensed site would be comparable to that of a source and byproduct licensee. The continued application of 10 CFR 73 security requirements would cause SMUD to expend significantly more funds for security requirements than other source and byproduct facilities. Therefore, compliance with 10 CFR 73 would result in costs significantly more than those incurred by others similarly situated.

Granting the requested exemption and license amendment will allow SMUD to use its decommissioning funds more efficiently because funds that would otherwise be used to support security requirements would be available to support decommissioning activities. Decommissioning operations would not be constrained by security requirements that are no longer meaningful concerning the protection of public health and safety. Therefore, SMUD will be able to perform decommissioning activities more efficiently, thereby making better use of available decommissioning funds.

Following the transfer of fuel to the 10 CFR 72 licensed ISFSI, the security of fuel will be maintained because the security requirements in 10 CFR 72, Subpart H will be in place to

provide for the protection of the spent fuel. Therefore, the protection of this special nuclear material will continue following transfer of the spent fuel from the 10 CFR 50 licensed facility.

Based on the maintenance of appropriate security requirements for special nuclear material under the 10 CFR 72 license, the requested exemption is authorized by law, will not endanger life or property or the common defense, and is otherwise in the public interest. Further, special circumstances are present because the continued application of the 10 CFR 73 requirements to the 10 CFR 50 licensed site would no longer be necessary to achieve the underlying purpose of the rule and requiring continue compliance would result in costs significantly in excess of those incurred by others similarly situated. Therefore, this exemption request meets the requirements in 10 CFR 50.12 and 10 CFR 73.5, and the NRC should grant the request.

### **Description of the Proposed Operating License and PDTS Change**

This proposed License and Technical Specification amendment would eliminate the Rancho Seco Nuclear Generating Station security plan requirements, pursuant to 10 CFR Part 73 and 10 CFR 50.54(p), upon the successful transfer of spent nuclear fuel from the spent fuel pool to the Independent Spent Fuel Storage Installation (ISFSI). Specific changes include the following:

1. Delete Section 2.C(3) "Physical Protection" from Rancho Seco Facility Operating License No. DPR-54.
2. Delete all references in the PDTS to the Rancho Seco Nuclear Generating Station security plans.



## No Significant Hazards Consideration

SMUD has reviewed the proposed license and PDTS change against each of the criteria in 10 CFR 50.92 and has concluded that the amendment request involves no significant hazards consideration. The following provides SMUD's analysis of the issue of no significant hazards consideration:

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The physical structures, systems, and components of the Rancho Seco 10 CFR 50 licensed site and the operating procedures for their use are unaffected by the proposed change. The elimination of the security requirements from the 10 CFR Part 50 licensed site does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility.

Elimination of the security requirements for the 10 CFR Part 50 license is predicated upon completion of the transfer of all nuclear fuel from the spent fuel pool to the ISFSI. The planned 10 CFR 72 licensing controls for the ISFSI will provide adequate confidence that personnel and equipment can perform satisfactorily for normal operations of the ISFSI and respond adequately to off-normal and accident events. The Rancho Seco Physical Protection Plan (PPP) will also provide confidence that security personnel and safeguards systems will perform satisfactorily to ensure adequate protection for the storage of spent nuclear fuel. Therefore, the proposed 10 CFR Part 50 amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change is security related and has no direct impact on plant equipment or the procedures for operating plant equipment. The safety analysis for the facility remains complete and accurate. There are no physical changes to the facility, and the plant conditions for which the design basis accidents have been evaluated are still valid.

Because the ISFSI site is segregated from the 10 CFR Part 50 licensed site, licensed security activities under the 10 CFR Part 50 license will no longer be necessary after all the nuclear fuel has been moved. The planned 10 CFR 72 licensing controls for the ISFSI will provide adequate confidence that personnel and equipment can perform satisfactorily for normal operations of the ISFSI and respond adequately to off-normal and accident events. Moreover, the ISFSI will be physically separate from the 10 CFR 50 licensed site structures and equipment. Therefore, the proposed 10 CFR Part 50 license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed license amendment involve a significant reduction in a margin of safety?

No. As described above, the proposed change is security related and has no direct impact on plant equipment or the procedures for operating plant equipment. There are no changes to the design or operation of the facility.

The assumptions for a fuel handling and other accidents are not affected by the proposed license amendment. Accordingly, neither the design basis nor the accident assumptions in the Defueled Safety Analysis Report (DSAR), nor the PDTS Bases are affected. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

**Attachment 3**

***Revised, Affected License and Technical Specification Pages***

- (3) Pursuant to the Act and 10 CFR Part 30, to receive, possess, and use at any time 100 millicuries each of any byproduct material, without restriction to chemical or physical form, for sample analysis or instrument calibration;

**(Amendment 117 - 03/17/92)**

- (4) Pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material, without restriction to chemical or physical form, for sample analysis or instrument calibration;

**(Amendment 117 - 03/17/92)**

- (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as were produced by the previous operation of the facility.

**(Amendment 117 - 03/17/92)**

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

- (1) Maximum Power

The licensee is not authorized to operate the reactor.

**(Amendment 117 - 03/17/92)**

- (2) Permanently Defueled Technical Specifications

The Permanently Defueled Technical Specifications contained in Appendix A, as revised through Amendment No. 129 are hereby incorporated in the license. Sacramento Municipal Utility District shall maintain the facility in accordance with the Permanently Defueled Technical Specifications.

**(Amendment 127 - 11/12/99)**

(3) Intentionally Deleted

(4) The licensee shall implement and maintain in effect all provisions of the approved fire protection program, as described in the Fire Protection Plan for Rancho Seco Nuclear Generating Station, and as approved in the SER dated September 10, 1990, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

**(Amendment 115 - 09/10/90)**

(5) The licensee shall perform the supplementary in-service tests and inspections of Nuclear Class 2 and Class 3 systems and components committed to in the letter of February 27, 1978, from J. J. Mattimoe to R. W. Reid.

**(Amendment 20 - 05/30/78)**

(6) In accordance with the provisions of 10 CFR 50.12(a) an exemption from the provisions of 10 CFR 50.55a(g)(4)(v) is granted, and the effective date for the start of the next 40-month period is extended from August 18, 1978 to October 18, 1979.

**(Amendment 20 - 05/30/78)**

## DEFINITIONS (Continued)

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### D1.9 LICENSEE EVENT REPORT

Defined under Administrative Controls Specification D6.9.5.

### D1.10 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP) MANUAL

The RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP) MANUAL shall contain a description of the Rancho Seco radiological environmental monitoring program. The REMP MANUAL shall also contain the REMP requirements of Specification D6.8.3b, a description of the environmental samples to be collected, sample locations, sampling frequencies, sample analysis criteria, and a description of the information to be included in the Annual Radiological Environmental Operating Report as required by Specification D6.9.2.3.

### D1.11 NUCLEAR SAFETY

NUCLEAR SAFETY shall refer to those systems, components and administrative controls that have or may have an effect on the health and safety of the general public.

### D1.12 INDUSTRIAL AREA

The INDUSTRIAL AREA shall be that portion of the site property, the access to which is controlled by security fencing, equipment, and personnel.

### D1.13 UNRESTRICTED AREA

An UNRESTRICTED AREA shall be any area at or beyond the INDUSTRIAL AREA, access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential, industrial, commercial, institutional and/or recreational purposes.

TABLE D1-1 SURVEILLANCE INTERVALS\*

Frequency	Notation	Definition
SHIFTLY	S	At least once per 12 hours.
DAILY	D	At least once per 24 hours.
WEEKLY	W	At least once per 7 days.
MONTHLY	M	At least once per 31 days.
QUARTERLY	Q	At least once per 92 days.
6 MONTHS	SY	At least once per 184 days.
ANNUALLY	A	At least once per 12 months.
18 MONTHS	18M	At least once per 18 months.

\* See Specification D4.0.2.

## ADMINISTRATIVE CONTROLS (Continued)

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### RESPONSIBILITIES

D6.5.1.6 The PRC shall be responsible for review of:

- a. The required safety evaluation of: (1) all procedures and programs required by Specification D6.8 and changes thereto, and (2) any other proposed procedures or programs or changes thereto which are as determined by the Plant Manager to affect NUCLEAR SAFETY.
- b. The safety evaluations of proposed tests and experiments that affect NUCLEAR SAFETY.
- c. Proposed changes to the Technical Specifications or the Facility Operating License (Possession Only).
- d. All safety evaluations of proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY. Items which are determined by a qualified reviewer as not involving an unreviewed safety question, a change of Technical Specifications, or a change in a licensing basis document need not be reviewed by the PRC.
- e. Investigations of all violations of the Technical Specifications to determine adequacy of corrective action and to detect any degrading trend.
- f. Facility operations to detect potential safety hazards.
- g. Events requiring a Licensee Event Report as defined by 10 CFR 50.73 and NUREG-1022 to determine adequacy of corrective action and to detect any degrading trend. (See Specification D6.9.5.)
- h. Special investigations and reports thereon as requested by the Plant Manager.
- i. (Intentionally deleted)
- j. The Emergency Plan and changes thereto.
- k. The Fire Protection Plan Program and changes thereto.
- l. Changes to the PROCESS CONTROL PROGRAM, the OFF-SITE DOSE CALCULATION MANUAL and the RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM MANUAL. (See Specifications D6.13 and D6.14.)
- m. Major changes to the Radioactive Waste Treatment Systems (Liquid, Gaseous and Solid).
- n. Review of any accidental, unplanned, or uncontrolled release of radioactive material to the environs, including the preparation and forwarding of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence. The PRC shall forward these reports to the Plant Manager and the MSRC.

## ADMINISTRATIVE CONTROLS (Continued)

### D6.5.3 TECHNICAL REVIEW AND CONTROL

Activities which affect NUCLEAR SAFETY shall be conducted as follows:

- a. Procedures, plans, manuals, and programs required by Specification D6.8 and other procedures, plans, manuals, and programs which affect plant NUCLEAR SAFETY, and changes thereto, shall be prepared, reviewed and approved. Each such procedure, plan, manual, and program or change thereto shall be reviewed by an individual(s) other than the preparer, but who may be from the same organization as the preparer of the procedure, plan, manual and program or change thereto. Programs, plans, manuals, and procedures other than plant administrative procedures will be approved as delineated in writing by the Plant Manager, but not lower than a direct report to the Plant Manager. Such procedures, plans, manuals and programs shall be reviewed periodically in accordance with administrative procedures.

The Plant Manager will approve plant administrative procedures and Emergency Plan Implementing Procedures.

Approval of temporary procedure changes which clearly do not change the intent of the approved procedure can be made by two members of the plant management staff, at least one of whom is a Certified Fuel Handler. The change shall be documented, reviewed and approved by the procedure's approval authority within 14 days of implementation.

- b. Proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY shall be reviewed by an individual(s) other than the individual(s) who designed the modification, but who may be from the same organization as the individual(s) who designed the modifications. Such modifications shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- c. Proposed tests and experiments which affect plant NUCLEAR SAFETY and are not addressed in the DSAR shall be reviewed by an individual(s) other than the individual(s) who prepared the proposed test or experiment. Such tests or experiments shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification D6.5.3a, b and c shall meet or exceed the qualification requirements of Section 4, "Qualifications," of ANSI N18.1-1971, excluding Sections 4.5.2, "Technicians," and 4.5.3, "Repairmen." Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such a review shall be performed by the review personnel of the appropriate discipline. A list of qualified reviewers for the independent reviews described in D6.5.3a, b and c above shall be established by the Plant Manager.



## ADMINISTRATIVE CONTROLS (Continued)

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### TECHNICAL REVIEW AND CONTROL (Continued)

- e. Events reportable pursuant to Specification D6.9.5 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such reports shall be reviewed by the PRC and forwarded to the Plant Manager and the MSRC Chairman.

### D6.5.4 AUDITS

Audits of facility activities shall be performed under the cognizance of the Quality organization supervisor and in accordance with the Rancho Seco Quality Manual (RSQM). These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance and qualifications of the entire Rancho Seco facility technical staff.
- c. The result of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect NUCLEAR SAFETY for those changes not previously audited.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix B.
- e. The Facility Emergency Plan and implementing procedures.
- f. (Intentionally deleted)
- g. Any other area of facility operation considered appropriate by the Plant Manager or the Deputy AGM, Operations.
- h. Compliance with fire protection requirements and implementing procedures.
- i. An independent fire protection and loss prevention inspection and audit shall be performed using either qualified off-site licensee personnel or an outside fire protection firm.
- j. The independent fire protection and loss prevention program inspection and audit shall be performed by an outside, qualified fire protection consultant at least once every 3 years.
- k. The Radiological Environmental Monitoring Program (REMP) and the results thereof.
- l. The ODCM and implementing procedures.
- m. The PCP and implementing procedures for processing and packaging of radioactive wastes from liquid systems.

## ADMINISTRATIVE CONTROLS (Continued)

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### AUDITS (Continued)

- n. The performance of activities required by the Quality Assurance Program for Effluent Control and Environmental Monitoring.

Audit reports of reviews encompassed by Specification D6.5.4 shall be forwarded to the Deputy AGM, Operations, the Plant Manager, the MSRC Chairman, and the management positions responsible for the areas reviewed within 30 days after completion.

The required frequencies for performance of the audits listed above are specified in the RSQM. Changes to these audit frequencies are subject to the requirements in 10 CFR 50.54(a).

### D6.6 LICENSEE EVENT REPORT ACTION

The following actions shall be taken for events which are reportable as LICENSEE EVENT REPORTS:

- a. The Commission shall be notified and a report submitted per Specification D6.9.5, pursuant to the requirements of 10 CFR 20.2203, 50.73, and
- b. Each LICENSEE EVENT REPORT shall be reviewed by the PRC and the results of this review submitted to the MSRC. Each LICENSEE EVENT REPORT shall be reviewed and approved by the Plant Manager or designee.

### D6.7 -NOT USED-

### D6.8 PROCEDURES, PLANS, MANUALS, AND PROGRAMS

D6.8.1 Written procedures, plans, manuals, and programs shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Safety Guide 33, November 1972
- b. Irradiated Core Component Storage, Fuel Movement Operations, Decommissioning, and Decontamination
- c. Surveillance and test activities on equipment required for long-term safe storage of irradiated core components
- d. (Intentionally deleted)
- e. Emergency Plan implementation
- f. Fire Protection Program Plan implementation
- g. PCP implementation
- h. ODCM implementation
- i. REMP MANUAL implementation
- j. Quality Assurance Program for Effluent Control and Environmental Monitoring using the guidance of Regulatory Guide 4.15, Revision 1, February 1979
- k. Certified Fuel Handler Training Program implementation
- l. Quality Assurance Program implementation
- m. Radiation Protection Program implementation

## ADMINISTRATIVE CONTROLS (Continued)

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### D6.9.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

### D6.9.4 ANNUAL REPORT

A routine report consisting of shutdown statistics, a narrative summary of shutdown experience, major maintenance of structures, systems, and components required for long-term safe storage of irradiated fuel assemblies, and tabulations of facility changes, tests or experiments required pursuant to 10 CFR 50.59(b) shall be submitted on an annual basis to the U. S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Office, postmarked no later than 30 days following the twelve month period covered by the report.

### D6.9.5 LICENSEE EVENT REPORT

The types of events listed in 10 CFR 20.2203 and 50.73 shall be the subject of LICENSEE EVENT REPORTS, submitted to the U.S. Nuclear Regulatory Commission (NRC), Document Control Desk, Washington, D.C. 20555, within the time requirements of 10 CFR 20.2203, 50.73 and 73.71. An additional copy shall also be submitted to the Regional Administrator of the Region IV Office. The written report shall include a completed copy of a LICENSEE EVENT REPORT form, pursuant to 10 CFR 20.2203, 50.73 and 73.71 and the guidance of NUREG-1022, and a description of corrective actions and measures to prevent recurrence. Supplemental reports may be required to fully describe final resolution of the occurrence. For corrected or supplemental reports, a LICENSEE EVENT REPORT shall be completed and reference shall be made to the original report date, pursuant to the requirements of 10 CFR 20.2203, 50.73 or 73.71 as appropriate.

### D6.9.6 ENVIRONMENTAL REPORTS

- a. When a change to the plant design or to the plant operation is planned which would have a significant adverse effect on the environment or which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change will be made to the NRC prior to implementation. The report will include a description and evaluation of the change, including a supporting benefit-cost analysis.

***Attachment 4***

***Redline/Strikeout Version of the Affected Pages***

- (3) Pursuant to the Act and 10 CFR Part 30, to receive, possess, and use at any time 100 millicuries each of any byproduct material, without restriction to chemical or physical form, for sample analysis or instrument calibration;

**(Amendment 117 - 03/17/92)**

- (4) Pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material, without restriction to chemical or physical form, for sample analysis or instrument calibration;

**(Amendment 117 - 03/17/92)**

- (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as were produced by the previous operation of the facility.

**(Amendment 117 - 03/17/92)**

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

- (1) Maximum Power

The licensee is not authorized to operate the reactor.

**(Amendment 117 - 03/17/92)**

- (2) Permanently Defueled Technical Specifications

The Permanently Defueled Technical Specifications contained in Appendix A, as revised through Amendment No. 127,129 are hereby incorporated in the license. Sacramento Municipal Utility District shall maintain the facility in accordance with the Permanently Defueled Technical Specifications.

**(Amendment 127 - 11/12/99)**

(3) Intentionally Deleted Physical Protection

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~~The licensee shall fully implement and maintain in effect all provisions of the Physical Security Plan (which includes the Rancho Seco Nuclear Generating Station Safeguards Contingency Plan) and the Security Guard Training and Qualification Plan approved by the Commission and all changes and amendments made pursuant to the authority of 10 CFR 50.54(p) and 10 CFR 50.90. The Physical Security Plan, which contains information which is exempt from public disclosure pursuant to the authority of 10 CFR 73.21, consists of a document entitled: Physical Security Plan for Rancho Seco Nuclear Generating Station, submitted by letter dated October 22, 1990, as amended by letters dated March 27 and April 24, 1991. The Security Guard Training and Qualification Plan, consists of a document entitled: Security Guard Training and Qualification Plan, submitted by letter dated August 20, 1990.~~

~~(Amendment 116 - 07/05/91)~~

(4) The licensee shall implement and maintain in effect all provisions of the approved fire protection program, as described in the Fire Protection Plan for Rancho Seco Nuclear Generating Station, and as approved in the SER dated September 10, 1990, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(Amendment 115 - 09/10/90)

(5) The licensee shall perform the supplementary in-service tests and inspections of Nuclear Class 2 and Class 3 systems and components committed to in the letter of February 27, 1978, from J. J. Mattimoe to R. W. Reid.

(Amendment 20 - 05/30/78)

(6) In accordance with the provisions of 10 CFR 50.12(a) an exemption from the provisions of 10 CFR 50.55a(g)(4)(v) is granted, and the effective date for the start of the next 40-month period is extended from August 18, 1978 to October 18, 1979.

(Amendment 20 - 05/30/78)

DEFINITIONS (Continued)

D1.9 LICENSEE EVENT REPORT

Defined under Administrative Controls Specification D6.9.5.

D1.10 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP) MANUAL

The RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP) MANUAL shall contain a description of the Rancho Seco radiological environmental monitoring program. The REMP MANUAL shall also contain the REMP requirements of Specification D6.8.3b, a description of the environmental samples to be collected, sample locations, sampling frequencies, sample analysis criteria, and a description of the information to be included in the Annual Radiological Environmental Operating Report as required by Specification D6.9.2.3.

D1.11 NUCLEAR SAFETY

NUCLEAR SAFETY shall refer to those systems, components and administrative controls that have or may have an effect on the health and safety of the general public.

D1.12 INDUSTRIAL AREA

The INDUSTRIAL AREA shall be that portion of the site property, the access to which is controlled as described in the NRC approved Security Plan by security fencing, equipment, and personnel.

D1.13 UNRESTRICTED AREA

The UNRESTRICTED AREA shall be any area at or beyond the INDUSTRIAL AREA, access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential, industrial, commercial, institutional and/or recreational purposes.

TABLE D1-1 SURVEILLANCE INTERVALS\*

Frequency	Notation	Definition
SHIFTLY	S	At least once per 12 hours.
DAILY	D	At least once per 24 hours.
WEEKLY	W	At least once per 7 days.
MONTHLY	M	At least once per 31 days.
QUARTERLY	Q	At least once per 92 days.
6 MONTHS	SY	At least once per 184 days.
ANNUALLY	A	At least once per 12 months.
18 MONTHS	18M	At least once per 18 months.

\* See Specification D4.0.2.

## ADMINISTRATIVE CONTROLS (Continued)

### RESPONSIBILITIES

D6.5.1.6 The PRC shall be responsible for review of:

- a. The required safety evaluation of: (1) all procedures and programs required by Specification D6.8 and changes thereto, and (2) any other proposed procedures or programs or changes thereto which are as determined by the Plant Manager to affect NUCLEAR SAFETY.
- b. The safety evaluations of proposed tests and experiments that affect NUCLEAR SAFETY.
- c. Proposed changes to the Technical Specifications or the Facility Operating License (Possession Only).
- d. All safety evaluations of proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY. Items which are determined by a qualified reviewer as not involving an unreviewed safety question, a change of Technical Specifications, or a change in a licensing basis document need not be reviewed by the PRC.
- e. Investigations of all violations of the Technical Specifications to determine adequacy of corrective action and to detect any degrading trend.
- f. Facility operations to detect potential safety hazards.
- g. Events requiring a Licensee Event Report as defined by 10 CFR 50.73 and NUREG-1022 to determine adequacy of corrective action and to detect any degrading trend. (See Specification D6.9.5.)
- h. Special investigations and reports thereon as requested by the Plant Manager.
- i. ~~The Physical Security Plan and changes thereto.~~ (Intentionally deleted)
- j. The Emergency Plan and changes thereto.
- k. The Fire Protection Plan Program and changes thereto.
- l. Changes to the PROCESS CONTROL PROGRAM, the OFF-SITE DOSE CALCULATION MANUAL and the RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM MANUAL. (See Specifications D6.13 and D6.14.)
- m. Major changes to the Radioactive Waste Treatment Systems (Liquid, Gaseous and Solid).
- n. Review of any accidental, unplanned, or uncontrolled release of radioactive material to the environs, including the preparation and forwarding of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence. The PRC shall forward these reports to the Plant Manager and the MSRC.



## ADMINISTRATIVE CONTROLS (Continued)

### D6.5.3 TECHNICAL REVIEW AND CONTROL

Activities which affect NUCLEAR SAFETY shall be conducted as follows:

- a. Procedures, plans, manuals, and programs required by Specification D6.8 and other procedures, plans, manuals, and programs which affect plant NUCLEAR SAFETY, and changes thereto, shall be prepared, reviewed and approved. Each such procedure, plan, manual, and program or change thereto shall be reviewed by an individual(s) other than the preparer, but who may be from the same organization as the preparer of the procedure, plan, manual and program or change thereto. Programs, plans, manuals, and procedures other than plant administrative procedures will be approved as delineated in writing by the Plant Manager, but not lower than a direct report to the Plant Manager. Such procedures, plans, manuals and programs shall be reviewed periodically in accordance with administrative procedures.

The Plant Manager will approve plant administrative procedures, ~~Security Plan Implementing Procedures~~ and Emergency Plan Implementing Procedures.

Approval of temporary procedure changes which clearly do not change the intent of the approved procedure can be made by two members of the plant management staff, at least one of whom is a Certified Fuel Handler. The change shall be documented, reviewed and approved by the procedure's approval authority within 14 days of implementation.

- b. Proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY shall be reviewed by an individual(s) other than the individual(s) who designed the modification, but who may be from the same organization as the individual(s) who designed the modifications. Such modifications shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- c. Proposed tests and experiments which affect plant NUCLEAR SAFETY and are not addressed in the DSAR shall be reviewed by an individual(s) other than the individual(s) who prepared the proposed test or experiment. Such tests or experiments shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification D6.5.3a, b and c shall meet or exceed the qualification requirements of Section 4, "Qualifications," of ANSI N18.1-1971, excluding Sections 4.5.2, "Technicians," and 4.5.3, "Repairmen." Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such a review shall be performed by the review personnel of the appropriate discipline. A list of qualified reviewers for the independent reviews described in D6.5.3a, b and c above shall be established by the Plant Manager.

## ADMINISTRATIVE CONTROLS (Continued)

### TECHNICAL REVIEW AND CONTROL (Continued)

- e. Events reportable pursuant to Specification D6.9.5 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such reports shall be reviewed by the PRC and forwarded to the Plant Manager and the MSRC Chairman.

### D6.5.4 AUDITS

Audits of facility activities shall be performed under the cognizance of the Quality organization supervisor and in accordance with the Rancho Seco Quality Manual (RSQM). These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance and qualifications of the entire Rancho Seco facility technical staff.
- c. The result of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect NUCLEAR SAFETY for those changes not previously audited.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix B.
- e. The Facility Emergency Plan and implementing procedures.
- f. ~~The Facility Security Plan and implementing procedures.~~(Intentionally deleted)
- g. Any other area of facility operation considered appropriate by the Plant Manager or the Deputy AGM, Operations.
- h. Compliance with fire protection requirements and implementing procedures.
- i. An independent fire protection and loss prevention inspection and audit shall be performed using either qualified off-site licensee personnel or an outside fire protection firm.
- j. The independent fire protection and loss prevention program inspection and audit shall be performed by an outside, qualified fire protection consultant at least once every 3 years.
- k. The Radiological Environmental Monitoring Program (REMP) and the results thereof.
- l. The ODCM and implementing procedures.
- m. The PCP and implementing procedures for processing and packaging of radioactive wastes from liquid systems.

## ADMINISTRATIVE CONTROLS (Continued)

### AUDITS (Continued)

- n. The performance of activities required by the Quality Assurance Program for Effluent Control and Environmental Monitoring.

Audit reports of reviews encompassed by Specification D6.5.4 shall be forwarded to the Deputy AGM, Operations, the Plant Manager, the MSRC Chairman, and the management positions responsible for the areas reviewed within 30 days after completion.

The required frequencies for performance of the audits listed above are specified in the RSQM. Changes to these audit frequencies are subject to the requirements in 10 CFR 50.54(a).

### D6.6 LICENSEE EVENT REPORT ACTION

The following actions shall be taken for events which are reportable as LICENSEE EVENT REPORTS:

- a. The Commission shall be notified and a report submitted per Specification D6.9.5, pursuant to the requirements of 10 CFR 20.2203, 50.73, and appropriate portions of 73.74 (as described in the Rancho Seco Physical Security Plan) and
- b. Each LICENSEE EVENT REPORT shall be reviewed by the PRC and the results of this review submitted to the MSRC. Each LICENSEE EVENT REPORT shall be reviewed and approved by the Plant Manager or designee.

### D6.7 -NOT USED-

### D6.8 PROCEDURES, PLANS, MANUALS, AND PROGRAMS

D6.8.1 Written procedures, plans, manuals, and programs shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Safety Guide 33, November 1972
- b. Irradiated Core Component Storage, Fuel Movement Operations, Decommissioning, and Decontamination
- c. Surveillance and test activities on equipment required for long-term safe storage of irradiated core components
- d. ~~Security Plan implementation~~(Intentionally deleted)
- e. Emergency Plan implementation
- f. Fire Protection Program Plan implementation
- g. PCP implementation
- h. ODCM implementation
- i. REMP MANUAL implementation
- j. Quality Assurance Program for Effluent Control and Environmental Monitoring using the guidance of Regulatory Guide 4.15, Revision 1, February 1979
- k. Certified Fuel Handler Training Program implementation
- l. Quality Assurance Program implementation
- m. Radiation Protection Program implementation

## ADMINISTRATIVE CONTROLS (Continued)

### D6.9.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

### D6.9.4 ANNUAL REPORT

A routine report consisting of shutdown statistics, a narrative summary of shutdown experience, major maintenance of structures, systems, and components required for long-term safe storage of irradiated fuel assemblies, and tabulations of facility changes, tests or experiments required pursuant to 10 CFR 50.59(b) shall be submitted on an annual basis to the U. S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Office, postmarked no later than 30 days following the twelve month period covered by the report.

### D6.9.5 LICENSEE EVENT REPORT

The types of events listed in 10 CFR 20.2203, and 50.73 and the appropriate portions of 73.71 (as described in the ~~Rancho Seco Physical Security Plan~~) shall be the subject of LICENSEE EVENT REPORTS, submitted to the U.S. Nuclear Regulatory Commission (NRC), Document Control Desk, Washington, D.C. 20555, within the time requirements of 10 CFR 20.2203, 50.73 and 73.71. An additional copy shall also be submitted to the Regional Administrator of the Region IV Office. The written report shall include a completed copy of a LICENSEE EVENT REPORT form, pursuant to 10 CFR 20.2203, 50.73 and 73.71 and the guidance of NUREG-1022, and a description of corrective actions and measures to prevent recurrence. Supplemental reports may be required to fully describe final resolution of the occurrence. For corrected or supplemental reports, a LICENSEE EVENT REPORT shall be completed and reference shall be made to the original report date, pursuant to the requirements of 10 CFR 20.2203, 50.73 or 73.71 as appropriate.

### D6.9.6 ENVIRONMENTAL REPORTS

- a. When a change to the plant design or to the plant operation is planned which would have a significant adverse effect on the environment or which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change will be made to the NRC prior to implementation. The report will include a description and evaluation of the change, including a supporting benefit-cost analysis.